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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OLEG MASKAEV and DENNIS RAPPAPORT : PRODUCTIONS, LTD.,

Plaintiffs, : CIV. NO. 07 CV 3147 (DAB)

-against-

WORLD BOXING COUNCIL, SAMUEL PETER, DUVA BOXING, LLC AND DON KING PRODUCTIONS, INC.

Defendants. :

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MEMORANDUM OF LAW OF DEFENDANT DON KING PRODUCTIONS, INC. IN SUPPORT OF ITS MOTION TO DISMISS THE AMENDED COMPLAINT OR STAY THE PROCEEDINGS PENDING MEDIATION AND ARBITRATION

Defendant Don King Productions, Inc. ("DKP") submits this memorandum of law in support of its motion to dismiss the amended complaint or, alternatively, for a stay pending mandatory mediation, and if necessary, mandatory arbitration proceedings. DKP relies upon and incorporates herein by reference World Boxing Council's Memorandum of Law in Support of its Motion to Dismiss the Amended Complaint or Stay the Proceedings Pending Mediation, dated July 31, 2007.

Dated: New York, New York August **20**, 2007

CURTIS, MALLET-PREVOST,

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